

REMARKS/ARGUMENTS

In view of the foregoing amendments and the following remarks, the applicant respectfully submits that the pending claims are not anticipated under 35 U.S.C. § 102 and are not rendered obvious under 35 U.S.C. § 103. Accordingly, it is believed that this application is in condition for allowance. **If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, the applicant respectfully requests that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits.**

The applicant will now address each of the issues raised in the outstanding Office Action.

Rejections under 35 U.S.C. § 102

Claims 1, 2, 9 and 10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by "Panasonic PV-DV800" ("the Panasonic reference"). The applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Independent claim 1 is not anticipated by the Panasonic reference because the Panasonic reference does not teach a second cover being moved, **in accordance with opening of the first cover**, to the open position where the second cover opens the opening portion of the

recording medium storage chamber, together with the other features recited in claim 1.

The Examiner contends that the claim recitation "the second cover being moved, in accordance with opening of the first cover, to the open position where the second cover opens portion of the recording medium storage chamber" in claim 1 reads on the CARD EJECT Switch on page 9 of the Panasonic reference, which is used to open the M-CARD Door (characterized by the Examiner as a second cover). (See Paper No. 20070620, page 3.) Specifically, the Examiner notes that the CARD EJECT Switch is only accessible when the LCD Monitor (characterized by the Examiner as a first cover) is open, and concludes that the M-CARD Door can only be opened in accordance with the LCD Monitor in the Panasonic reference. (See Paper NO. 20070620, page 3.) The applicant respectfully disagrees.

In the Panasonic reference, even when the LCD Monitor (characterized by the Examiner as the first cover) is opened, the CARD EJECT Switch is merely usably exposed to a user. That is the M-CARD Door (characterized by the Examiner as the second cover) is not immediately opened, but rather **is only opened if** the CARD EJECT switch is pressed. Thus, the M-CARD Door is not opened **in accordance with** opening of the LCD monitor, to the open position, but rather, is opened in accordance with the state of the CARD EJECT switch. Although the CARD EJECT switch can only be accessed when the LCD Monitor is opened, the M-CARD door is not opened **in accordance with** the opening of the LCD Monitor (first cover), to the open position because the M-CARD door can remain closed if the CARD EJECT switch is not pressed.

This is in contrast to claim 1 in which the second cover is automatically opened **in accordance with** opening of the first cover.

Thus, independent claim 1 is not anticipated by the Panasonic reference for at least this reason. Since claims 2, 9 and 10 depend from claim 1, these claims are similarly not anticipated by the Panasonic reference.

The foregoing feature of the claimed invention provides advantages not found in the Panasonic reference. Specifically, the second cover provides additional protection of a recording medium, while still allowing the recording medium to be easily replaced with another one (as is the case with a conventional camera having a single-cover structure). This advantageous convenience cannot be obtained in device discussed in the Panasonic reference since two steps are required in order to open the M-CARD Door -- (1) opening the LCD Monitor, and (2) further operating the CARD EJECT switch.

Rejections under 35 U.S.C. § 103

Claims 3-6 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the Panasonic reference in view of Japanese Patent Application Publication No. 10-256748 ("the Kunio publication"). The applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

The Kunio publication is cited as teaching enabling the closing of two covers simultaneously. (See Paper No. 20070620, page 4.) Even assuming, *arguendo*, that this is correct, and further assuming, *arguendo*, that one skilled

in the art would have been motivated to combine these references as proposed, the purported teaching of the Kunio publication would not compensate for the deficiency, demonstrated above, of the Panasonic reference with respect to claim 1. Since claim 3-6 depend, either directly or indirectly, from claim 1, they are not rendered obvious by the Panasonic reference and the Kunio publication for at least this reason.

Further, claim 3 concerns providing a spring member **for moving the second cover to the open position**. Consequently, the Examiner's argument related to providing a method of **closing both covers simultaneously** by combining the Panasonic reference and the Kunio publication is irrelevant. Thus, claim 3 is not rendered obvious by the Panasonic reference and the Kunio publication for at least this additional reason. Since claims 4-6 depend, either directly or indirectly, from claim 3, they are not rendered obvious by the Panasonic reference and the Kunio publication for at least this reason.

Dependent claim 6 further recites a release operation member for receiving a pressing force of the first cover when the first cover moves to the closed position, and **then moving an engagement member** (which is provided to be movable between an engagement position where the engagement member is capable of engaging the second cover moved to the closed position, in the closed position) **to the non-engagement position against an urging force of the urging member**. An exemplary embodiment consistent with this claim is illustrated in Figure 4B of the present application. This is in contrast with the Kunio publication, where the second

cover is locked. Thus, claim 6 is not rendered obvious by the Panasonic reference and the Kunio publication for at least this additional reason.

Claims 7 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the Panasonic reference in view of the Kunio publication, and further in view of U.S. Patent No. 6,542,186 ("the Uryu patent"). The applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

The Uryu patent is cited as teaching a detecting portion for detecting an opening or closing of the second cover. (See Paper No. 20070620, page 6.) Even assuming, *arguendo*, that this is correct, and further assuming, *arguendo*, that one skilled in the art would have been motivated to combine these references as proposed, the purported teaching of the Uryu patent would not compensate for the deficiency, demonstrated above, of the Panasonic reference with respect to claim 1. Since claims 7 and 8 depend, indirectly, from claim 1, they are not rendered obvious by the Panasonic reference, the Kunio publication and the Uryu patent for at least this reason.

New claim

New dependent claim 11 further distinguishes the claimed invention over the Panasonic reference.

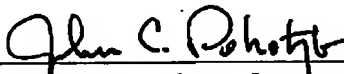
Conclusion

In view of the foregoing amendments and remarks, the applicant respectfully submits that the pending claims are in condition for allowance. Accordingly, the applicant requests that the Examiner pass this application to issue.

Any arguments made in this amendment pertain **only** to the specific aspects of the invention **claimed**. Any claim amendments or cancellations, and any arguments, are made **without prejudice to, or disclaimer of**, the applicant's right to seek patent protection of any unclaimed (e.g., narrower, broader, different) subject matter, such as by way of a continuation or divisional patent application for example.

Respectfully submitted,

October 3, 2007

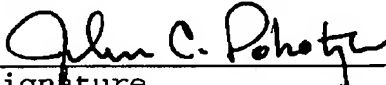

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